PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



October 31, 2016

Mr. Mr. Timothy Hermann (therman@aglresources.com)
VP Storage Peaking & Ops
AGL Services Company
Two Allen Center
1200 Smith Street
Houston, TX 77002

GI-2016-08-CVS39-08

SUBJECT: General Order 112¹ Transmission Integrity Management Plan (TIMP) Inspection of Central Valley Gas Storage (CVGS)

Dear Mr. Hermann:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Paul Penney and Molla Mohammad conducted a General Order 112 TIMP inspection of CVGS's TIMP records on August 15, 2016. The inspection included a review of records related to HCA identification, as well as a field inspection of accessible areas along CVGS's transmission line right-of-way.

As identified during the records review, CVGS does an HCA analysis on a yearly basis using Method 1. As of the date of the audit, CVGS has not identified any areas along its transmission line that meet the definition of an HCA, and therefore would be subject to CFR 49, Part 192, Subpart O requirements.

No response to the audit letter is necessary. Thank you for your cooperation with this safety inspection.

If you have any questions, please contact Paul Penney at (415) 703-1817 or by email at Paul.Penney@cpuc.ca.gov.

Sincerely,

Kenneth Bruno

Kuneth A. E

Program Manager

Gas Safety and Reliability Branch Safety and Enforcement Division

cc: Molla Mohammad, SED

Mark Stephens, CVGS (mstephen@aglresources.com)
John Boehme, CVGS (jboehme@aglresources.com)

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.